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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In Re:

Case No. 16-23700

BEVERLY VALENCIA

Chapter 13

Debtor.

Judge Kevin R. Anderson

**MOTION TO VACATE DISMISSAL AND REINSTATE CHAPTER 13, RESCHEDULE
341 MEETING OF CREDITORS, AND CONFIRMATION HEARING**

Debtor, by and through counsel undersigned, pursuant to FED. R. BANKR. P. 9024, hereby moves the Court for an Order vacating the order of dismissal, rescheduling the 341 Meeting of Creditors and Confirmation hearing, and extending the deadline for creditors to object to dischargeability and file claims for 60 days after the new date set for the Meeting of Creditors. In support thereof, Debtor states as follows:

1. On April 29, 2016, the Debtor filed her Chapter 13 Voluntary Petition.
2. Debtor's 341 Meeting was held on June 3, 2016.
3. Debtor's first Confirmation Hearing was scheduled on July 12, 2016.
4. Due to confusion with Debtor's Counsel, the Debtor's 2012 taxes were not uploaded to the Trustee. On August 9, 2016, the Debtor's case was dismissed for failure to submit said tax returns.
5. Debtor has since uploaded her 2012 taxes to the Trustee through ShareFile.

6. The Debtor was current on her plan payments at the time of dismissal.

7. The Debtor wishes to continue on in their bankruptcy case and requests that the order dismissing the case be vacated. The Debtor would suffer great hardship if required to re-file her case. No party in interest would be prejudiced by an order setting aside the dismissal.

THEREFORE, Debtor requests an Order which sets aside the Order dismissing this case. Debtor requests such other and further relief as the Court deems appropriate under the circumstances.

DATED: September 16, 2016.

/s/ Matthew K. Broadbent
Matthew K. Broadbent
Vannova Legal, PLLC